



School of Education and Human Services  
Department of Counseling  
Rochester, Michigan 48309-4393

November 14, 2017  
Representative Jim Tedder  
N-892 House Office Building  
P.O. Box 30014  
Lansing, MI 48909

RE: Proposed bill to revise the Public Health Code, Part 181 Counseling

Dear Rep. Tedder,

The faculty at the Oakland University Department of Counseling strongly support your bill to revise Counselor Licensure Law (Part 181 Public Health Code). Since the time that statute was signed into law in 1989, the breadth of the counseling profession has significantly increased. Whereas the scope of practice stated in the Administrative Rules accurately reflects the profession's current competencies, the scope of practice stated in the 1989 statute does not. We believe that the Michigan statute requires revision to accurately reflect the full scope of practice, training and expertise of Licensed Professional Counselors. We believe that your proposed bill redresses this deficit in the state statute.

Your bill also addresses LARA's requests that Professional Counselors clarify the scope of practice by bringing the current language from the Administrative Rules into State Statute. For example, the current Administrative Rules accurately reflects professional counselors' competencies to provide services that include diagnosis, psychotherapy, and assessment. In contrast, the 1989 statute inaccurately excludes those competencies from the counseling profession's scope of practice. Your proposed legislation moves these activities into statute, clarifying the true scope of practice of professional counselors.

There are additional benefits to your proposed bill. It reflects the scope of practice endorsed by the American Counseling Association (ACA) and the American Association of State Counseling Boards (AASCB), both of which help efforts towards establishing national licensure portability for professional counselors. Your bill is also in line with the training standards set forth by the national accrediting body for counselor education programs (i.e., Council for the Accreditation of Counseling and Related Educational Programs or CACREP), which have in turn been adopted by the Michigan Board of Counseling. Finally, your proposed bill incorporates key course content requirements in counseling programs such as social and cultural diversity, human growth and development, and diagnosis. Thus, your bill is consistent with the professional standards of the counseling profession, its accrediting bodies, the Administrative Rules, and accurately describes breadth of counselor competencies.